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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
YOUNG JOON YANG, et al.,  
Defendants

No. CR 05-00395 CRB

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
YON SUK PANG,  
a/k/a Yon S. Pang,  
a/k/a Nana, and  
HYON CHU YIM,  
a/k/a Hyon C. Yim,  
a/k/a Tina,  
Defendants.

No. CR 06-0101 ~~VRW~~ CRB

STIPULATION AND ~~PROPOSED~~  
SUPPLEMENTAL PROTECTIVE ORDER  
REGARDING DISCOVERY AS TO  
DEFENDANT HYON CHU YIM

The United States, through its counsel of record, and defendant Hyon Chu Yim, through her

1 counsel of record, hereby agree and stipulate that the government will provide discovery on the  
2 following conditions:

3 1. Protected Material

4 The discovery produced in this matter is deemed Protected Material. Possession of  
5 copies of the Protected Material is limited to the defendants, their attorneys of record, and  
6 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the  
7 attorneys of record (hereinafter collectively referred to as "members of the defense team").

8 The defendants, their attorneys of record, and members of the defense team acknowledge  
9 that providing copies of the Protected Material to other persons is prohibited, and agree not to  
10 duplicate or provide copies of the Protected Material to other persons. The defendants, their  
11 attorneys of record, and members of the defense team may show Protected Material to witnesses  
12 or prospective witnesses in conjunction with their defense of the defendants in this case. The  
13 defendants, their attorneys of record, and members of the defense team further acknowledge that  
14 they are prohibited from using the Protected Material for any purpose other than defending the  
15 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a  
16 violation of the Protective Order. Further, the attorneys of record agree that prior to  
17 disseminating any copies of the Protected Material to members of the defense team, they will  
18 provide a copy of this Protective Order to members of the defense team.

19 Notwithstanding efforts taken by the government to redact personal information of  
20 witnesses from the discovery provided to the defense (such as date of birth, social security  
21 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the  
22 defense team agree that, should any such information be found during their review of this  
23 material, they will not provide that personal information in any form – whether in verbal, written  
24 or electronic format – to any third party, for any reason whatsoever.

25 2 Nontermination

26 The provisions of this Order shall not terminate at the conclusion of this prosecution but  
27 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'  
28 attorneys of record shall return all copies of any Protected Material (including all copies provided

1 to the defendants, their attorneys of record, and members of the defense team) to the United  
2 States Attorney's Office for the Northern District of California.

3 SO STIPULATED.

4 DATED: 3/10/06

5 /S/ PETER B. AXELROD \_\_\_\_\_  
6 PETER B. AXELROD  
7 LAUREL BEELER  
8 Assistant United States Attorneys

9 DATED: 3/8/06

10 /S/ JOSEPH SULLIVAN \_\_\_\_\_  
11 JOSEPH O'SULLIVAN  
12 Counsel for Defendant HYON CHU YIM

13 **ORDER**  
14 IT IS SO ORDERED.

15 DATED: March 16, 2006

16 CHARLES R. BREYER  
17 United States District Court

